

Federal Defenders
OF NEW YORK, INC.

Southern District
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December 15, 2017

Ex-Parte
To be filed partially under seal

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
United States Courthouse
40 Centre Street - Room 415
New York NY 10007

Re: United States v. Sayfullo Habib
17 Cr. 0722 (VSB)

Dear Judge Broderick:

As set forth in our ex-parte letter dated December 13, 2017, the defense has identified a number of experts, with whom we intend to consult and potentially retain. In connection with these potential defense experts, the defense requests an order prohibiting the government from seeking access to Mr. Saipov's visitor log.

Without prior approval of this Court, the Government may not seek access to the visitor log. If and/or when the Government seeks approval to access the visitor log, the Court will review the visitor log in camera, request a list of potential defense experts from Defendant, and redact the visitor log as necessary.

SO ORDERED:

Vernon Broderick

HON. VERNON S. BRODERICK 1/5/2018
UNITED STATES DISTRICT JUDGE

[REDACTED]

[REDACTED]


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United States District Judge
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For this reason, we ask the Court to sign the enclosed order precluding the Government from seeking access to Mr. Saipov's visitor log, which is maintained by BOP staff at MCC New York. I ask that the second and third paragraphs of this letter remain ex-parte and under seal because they reference defense planning and strategy.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer Brown", with a stylized, flowing script.

Jennifer Brown

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